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**SURFACE TRANSPORTATION BOARD**  
**SECTION OF ENVIRONMENTAL ANALYSIS**

**POST POST ENVIRONMENTAL ASSESSMENT**

ENVIRONMENTAL RECOMMENDATIONS IN STB DOCKET NO. AB-490 (Sub-No. 1X)

February 20, 2007

**ABANDONMENT TYPE**

The time for comments on the Environmental Assessment (EA) has expired in this:

( ) Notice of Exemption (X) Petition for Exemption ( ) Regulated Abandonment

( ) **NO NEW COMMENTS WERE RECEIVED**

(X) **NEW COMMENTS WERE RECEIVED**

The Section of Environmental Analysis (SEA) served an Environmental Assessment (EA) for this proceeding on August 23, 2005, and then after receiving comments, added a condition that was included in the October 12, 2005 decision served for public review and comment. In the EA and Post EA, SEA recommended five (5) environmental conditions and concluded that the proposed action would not significantly impact the quality of the human environment. SEA has now determined that condition 4 can be removed.

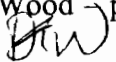
**Comments on the Post Post EA**

**Section 402 Stormwater Management Permit**

As noted in the EA, the South Carolina Department of Health and Environmental Control (SCDHEC) commented that the proposed 11.8 mile abandonment could impact state waters in accordance with sections 401, 402, and 404 of the Clean Water Act. SEA therefore recommended that prior to the commencement of salvage activities, the Greenville County Economic Development Corporation (GCEDC) consult with SCDHEC to ensure that any concerns regarding potential contamination of the right-of-way and the need for a 402 construction permit were addressed and the results of the consultation reported back to SEA prior to beginning any salvage operations.

SEA has recently been in consultation with Brian Kemp and Ann Clark, both of the SCDHEC, and Curtis Schopp, President of the National Salvage and Service Corporation (see attachments). In a February 7, 2007 email, Brian Kemp indicated that a stormwater construction permit would be required for activities involving one or more acres of ground disturbance, but due to the limited level of grading required for this project to address contamination issues (see Post Post EA dated February 15, 2007), requested that Ann Clark, Director of the Construction, Stormwater, and Agricultural Permitting Division, provide the final decision. Mr. Schopp subsequently sent a letter to Ms. Clark indicating that ground disturbance would be less than one acre. In a February 14, 2007 email response, Ms. Clark concurred with Mr. Schopp, that a stormwater permit would not be required if disturbance was less than one acre. Accordingly,

SEA has determined that both the contamination (see Post Post EA dated February 15, 2007 for this proceeding) and stormwater permit issues have been satisfied, and recommends that condition 4 be removed.

SEA CONTACT: Diana Wood phone: (202)565-1552, and (202) 245-0302 as of March 5, 2007 

Attachments

**Yudice, Sandra**

**From:** Brian K. Kemp [kempbk@dhec.sc.gov]  
**Sent:** Wednesday, February 07, 2007 6:07 PM  
**To:** Yudice, Sandra  
**Cc:** Ann Clark; John C. Cobb; Melissa McIndoe; Susan Turner; William H. Williamson  
**Subject:** Re: RE: Railroad Salvage Work in Greenville County, South Carolina

**Importance:** High

\*\* High Priority \*\*

Sandra,

The Storm Water Permitting Section will need more clarification from National Salvage than was provided concerning National Salvage stating "not needing a storm water permit due to not disturbing more than an acre". There may be a misunderstanding of what "disturbance" means.

According to Ray Copple of National Salvage on 02/05/07: 1) after the removal of tracks and ties above ground, back filling of holes will take place where the tracks and ties were removed. 2) Some tracks and ties are beneath the ground in some areas. Where there are tracks and ties beneath the ground, the tracks and ties in those areas will be removed from beneath the ground and back filling will take place after removal.

The above two items will need to be addressed more specifically by National Salvage to SCDHEC's Storm Water Permitting Section (Ann Clark) before a decision can be made on whether a storm water permit is needed. Currently, the Storm Water Permitting Section feels that a Storm Water Permit will be needed until they receive more specific information from National Salvage concerning the above two items stated by Ray Copple.

Suggestion: If you can ask National Salvage to call Ann Clark or Melissa McIndoe of SCDHEC's Storm Water Permitting Section, that would start the process of resolving the Storm Water Permitting Section's concerns.

Thank you for your hard work,  
Brian Kemp

>>> "Yudice, Sandra" <SYudice@greenvillecounty.org> 02/07/07 08:47 AM  
>>> >>>

<<Greenville Feb 5 response from NSS.pdf>>

Jonathan,  
The salvage company e-mailed this letter yesterday afternoon to your attention. Thank you.

Sandra E. Yúdice  
Assistant to the County Administrator  
County of Greenville, South Carolina  
301 University Ridge, Suite 2400

**Yudice, Sandra**

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**From:** Yudice, Sandra  
**Sent:** Thursday, February 08, 2007 9:41 AM  
**To:** ' (Curtis.schopp@nssx.biz)'; 'emily.pyle@nssx.biz'  
**Subject:** Railroad Salvage - stormwater permit

**Importance:** High

Mr. Schopp,

I received the following information from SCDHEC on the stormwater permit required:

The Storm Water Permitting Section will need more clarification from National Salvage than was provided concerning National Salvage stating "not needing a storm water permit due to not disturbing more than an acre". There may be a misunderstanding of what "disturbance" means.

According to Ray Copple of National Salvage on 02/05/07: 1) after the removal of tracks and ties above ground, back filling of holes will take place where the tracks and ties were removed. 2) Some tracks and ties are beneath the ground in some areas. Where there are tracks and ties beneath the ground, the tracks and ties in those areas will be removed from beneath the ground and back filling will take place after removal.

The above two items will need to be addressed more specifically by National Salvage to SCDHEC's Storm Water Permitting Section (Ann Clark) before a decision can be made on whether a storm water permit is needed. Currently, the Storm Water Permitting Section feels that a Storm Water Permit will be needed until they receive more specific information from National Salvage concerning the above two items stated by Ray Copple.

SCDHEC's contact information for the stormwater permit is: Melissa McIndoe: 803-898-4033; Ann Clark: 803-898-4028.

Thank you.

Sandra E. Yudice  
Assistant to the County Administrator  
County of Greenville, South Carolina  
301 University Ridge, Suite 2400  
Greenville, SC 29601  
Phone: (864) 467-7409  
Fax: (864) 467-7151  
E-mail: syudice@greenvillecounty.org  
[www.greenvillecounty.org](http://www.greenvillecounty.org)



"Curtis Schopp"  
<curtis.schopp@nssx.biz>  
02/15/2007 03:03 PM

To <woodd@stb.dot.gov>  
cc  
bcc

Subject FW: Ann Clark received your Greenville letter

Attached to this e-mail is Ann Clark's response and my letter confirming our conversation. Please send us an e-mail so we may proceed.

Thank you,  
Curtis C. Schopp  
President

National Salvage & Service Corporation  
PO BOX 300  
Clear Creek, IN 47426

Phone: 812-339-9000  
Fax : 812-331-8235

-----Original Message-----

From: Ann Clark [mailto:CLARKAR@dhec.sc.gov]  
Sent: Wednesday, February 14, 2007 9:31 AM  
To: Emily Pyle  
Cc: John C. Cobb; Melissa McIndoe; Susan Turner  
Subject: Re: Letter from Curtis Schopp

Yes this confirms our conversation. If total land disturbance for the entire project is less than one acre, a permit is not required. As stated in the letter, you should always use best management practices to assure that sediment is controlled.

Ann R. Clark, Director  
Construction, Stormwater, and Agricultural Permitting Division  
clarkar@dhec.sc.gov  
803-898-4028 (office) 803-898-4095 (fax)

>>> "Emily Pyle" <emily.pyle@nssx.biz> 2/13/2007 4:08 PM >>>  
Please let me know that you received this okay and are able to open the PDF.

Regards,

Emily Pyle  
National Salvage & Service Corp.  
812-339-9000



Ann Clark conversation of Feb 12.pdf



**NATIONAL SALVAGE & SERVICE CORPORATION**  
REMOVE • RECOVER • RESTORE

SURVIVAL & RECOVERY DIVISION

2007 FEB 12 A 9 56

OFFICE OF ECONOMICS  
DIRECTOR'S OFFICE

February 6, 2007

Mr. Jonathan McInnis  
South Carolina Department of Health & Environmental Control  
Federal & State Site Assessment Section  
Bureau of Land & Waste Management  
2600 Bull Street  
Columbia, SC 29201

RE: Greenville County Railroad Abandonment Project

Dear Mr. McInnis:

National Salvage & Service Corporation is in receipt of your letter of February 5 addressed to Sandra Yúdice. In order to ensure that the berm is not disrupted, National will not remove any ties that are adjacent to the former US Finishing site. We will remove the iron materials (rail, plates, and spikes) only in this area.

National will not be disturbing over one acre, so a stormwater permit will not be needed.

Please let me know if there is any additional information that is needed prior to starting removal.

Sincerely,

Curtis C. Schopp  
President